

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SHELDON G. ADELSON,

Plaintiff,

v.

MOSHE HANANEL,

Defendant.

Docket No. 04CV10357RCL

PLAINTIFF'S INITIAL DISCLOSURE

Plaintiff pursuant to Fed.R.Civ.P. 26(a)(1) makes the following initial disclosure:

A. The following individuals are likely to have discoverable information:

1. Paul G. Roberts -- The Interface Group, 300 First Avenue, Needham, MA 02494, (781) 707-2550. All matters relating to the agreements between the parties and that defendant had no role in any Macau transaction.
2. Sheldon G. Adelson, The Venetian Hotel & Casino, 3355 Las Vegas Boulevard South, Las Vegas, NV 89109, (702) 733-5500. All matters relating to each allegation of the complaint.
3. William Weidner, The Venetian Hotel & Casino, 3355 Las Vegas Boulevard South, Las Vegas, NV 89109, (702) 733-5500. All matters relating to the granting of gambling licenses in Macau and that defendant had no role.

4. David Friedman, The Venetian Hotel & Casino, 3355 Las Vegas Boulevard South, Las Vegas, NV 89109, (702) 733-5500. All matters relating to the granting of gambling licenses in Macau and that defendant had no role.

5. Stephen O'Connor, The Interface Group, 300 First Avenue, Needham, MA 02494, (781) 707-2550. All matters relating to the agreements between the parties and that defendant had no role in the granting of gambling licenses in Macau.

6. Bradley Stone, The Venetian Hotel & Casino, 3355 Las Vegas Boulevard South, Las Vegas, NV 89109, (702) 733-5500. All matters relating to the granting of gambling licenses in Macau and that defendant had no role.

7. Robert Goldstein, The Venetian Hotel & Casino, 3355 Las Vegas Boulevard South, Las Vegas, NV 89109, (702) 733-5500. All matters relating to the granting of gambling licenses in Macau and that defendant had no role.

8. Harry Miltenburger, The Venetian Hotel & Casino, 3355 Las Vegas Boulevard South, Las Vegas, NV 89109, (702) 733-5500. All matters relating to the granting of gambling licenses in Macau and that defendant had no role.

9. Leonard Adelson, The Interface Group, 300 First Avenue, Needham, MA 02494, (781) 707-2550. All matters relating to the granting of gambling licenses in Macau and that defendant had no role.

10. Jan Lochkenberg. All matters relating to the granting of gambling licenses in Macau and that defendant had no role.

11. Damian Hills, 41/F Edinburgh Tower, 15 Queens Road, Central Hong Kong. All matters relating to the granting of gambling licenses in Macau and that defendant had no role.

12. Irwin Chafetz, The Interface Group, 300 First Avenue, Needham, MA 02494, (781) 707-2550. All matters relating to the agreements between plaintiff and defendant.

13. Theodore Cutler, The Interface Group, 300 First Avenue, Needham, MA 02494, (781) 707-2550. All matters relating to the agreements between plaintiff and defendant.

Plaintiff reserves the right to amend this list.

B. Documents.

1. Plaintiff's travel records.

2. All transactional documents relative to applications for a gambling license in Macau.

3. Copies of newspaper articles and press releases concerning defendant's claims against plaintiff.

C. Damages.

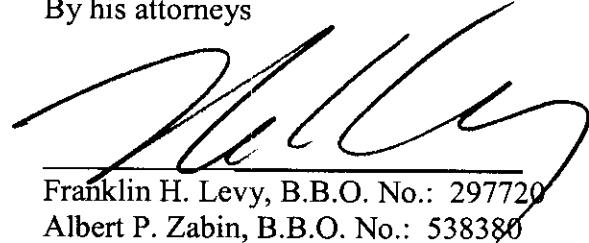
No computation of damages can yet be made.

D. Insurance.

There is none.

SHELDON G. ADELSON

By his attorneys



Franklin H. Levy, B.B.O. No.: 297720

Albert P. Zabin, B.B.O. No.: 538380

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(617) 289-9200

Dated: November 16, 2004

CERTIFICATE OF SERVICE

I hereby certify that on this day a true and correct copy of the above document was served upon the attorney of record for each party by mail/by-hand.

Dated: 11/16/04

